IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CANDIDA STOKES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	**Civil Action No.**
THE CITY OF MONTGOMERY,	)	**2:07-cv-686**
ARTHUR BAYLOR, Chief of Police,	)	
BOBBY BRIGHT, Mayor, in	)	
their individual	)	
and official capacities,	)	
	)	
Defendant.	)	

JOINT MOTION FOR EXTENSION OF TIME TO JOIN ADDITIONAL PARTIES AND TO AMEND PLEADINGS

COME NOW, the parties, by and through their attorneys, and respectfully move this Court to extend the deadline for the parties to join additional parties and to amend pleadings by thirty (30) days. As grounds for this Motion, the parties state as follows:

1. Under the current Scheduling Order, plaintiff is allowed until May 1, 2008 to join additional parties and to amend the pleadings. Defendants are allowed until May 30, 2008, for the same.

2. The parties in this case are currently engaged in settlement discussions. These discussions have been productive.

3. In an effort to facilitate the settlement process, counsel for the parties are keeping their fees low and thus have engaged in only very limited discovery during the settlement negotiations. The parties seek additional time to join additional parties and amend the pleadings to allow time to review paper discovery as well as take deposition testimony, should the settlement negotiations ultimately be unsuccessful. This discovery may provide information which would require a party to move to modify the pleadings.

4. The parties respectfully move this Court to extend the deadline to join additional parties and to amend the pleadings by thirty days. Such an extension would cause the new deadlines to be as follows: Plaintiff, June 1, 2008, and Defendants, June 30, 2008.

5. No party will be prejudiced by the granting of this Motion and this extension will not affect other deadlines.

WHEREFORE, the parties respectfully move this Honorable Court to grant this Motion and extend the deadline to join additional parties and to amend the pleadings by an additional thirty (30) days.

Dated : April 21, 2008.

/s/ Rachel L. McGinley
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